REMARKS/ARGUMENTS

Claims 1-25 are pending in this Application.

Claims 1-25 remain pending in the Application after entry of this Amendment.
No new matter has been entered.

In the Office Action, claims 1-25 stand rejected under 35 U.S.C. § 103(a) as being
unpatentable over U.S. Patent No. 6,961,330 (hereinafter "Cattan") in view of U.S. Patent
Application Publication No. 2001/0056508 (hereinafter "Arneson").

Claim Rejections Under 35 U.S. C. § 103(a)

Applicants respectfully traverse the rejections to claims 1-25 and request
reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) based on Cattan and
Arneson.

Applicants respectfully submit that a prima facie case of obviousness has not been
established by the evidence presented in the Office Action. As reiterated by the Supreme Court
in KSR International Co. v. Teleflex Inc. (KSR), 550 U.S. ___, 82 USPQ2d 1385 (2007), the
framework for the objective analysis for determining obviousness under 35 U.S.C. § 103 is
stated in Graham v. John Deere Co., 383 U.S. 1, 148 USPQ 459 (1966). The factual inquiries
enunciated by the Court are as follows:

(A) Determining the scope and content of the prior art;

(B) Ascertaining the differences between the claimed invention and the prior art;
and

(C) Resolving the level of ordinary skill in the pertinent art.

To reach a proper determination under 35 U.S.C. § 103(a), the Examiner must
step backward in time and into the shoes worn by the hypothetical "person of ordinary skill in
the art" when the invention was unknown and just before it was made. In view of all factual
information, the Examiner must then make a determination whether the claimed invention "as a
whole" would have been obvious at that time to that person. (M.P.E.P. § 2142). "To support the
conclusion that the claimed invention is directed to obvious subject matter, either the references
must expressly or impliedly suggest the claimed invention or the examiner must present a

convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references." Ex parte Clapp, 227 USPQ 972, 973 (Bd. Pat. App. & Inter. 1985).

Applicants respectfully submit that Cattan and Arneson, either individually or in combination, fail to disclose one or more of the claim limitations recited in each of claims 1-25. These differences, along with other differences, establish that the subject matter as a whole of claims 1-25 would not have been obvious at the time of invention to a person of ordinary skill in the art.

In rejecting claim 1, the Office Action concludes on page 3 that when "properly considered in combination, Cattan and Arneson would have taught and/or suggested to one of ordinary skill in the art to store and use a unique message identifier associated with particular messages to differentiate reply messages and allow them to be quickly associated with original messages to determine the appropriate actions to take in response to the message." However, the Office Action does not explain how the part "to determine the appropriate actions to take in response to the message" is possible with the combination of Cattan and Arneson.

Claim 1 recites "storing message state information at the computer system that is unique to a message to be sent to a device." As recited, the message state information provides a message identifier that uniquely identifies a message to be sent to a device and a mapping between the message identifier and stored action information. Applicants agree that Arneson provides a claim check associated with particular messages to allow the system to "differentiate reply messages and allow them to be quickly associated with original messages."

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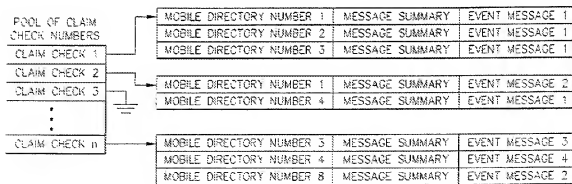Reply to Office Action of April 13, 2011

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FIG. 3 of Arneson provides the assignment of claim checks to messages in Arneson. However, there is no teaching or suggestion in Arneson to use the claim check to obtain information other than mobile directory numbers, message summaries, or the original messages as recited in claim 1 where a unique message identifier returned in a reply message is used to obtain stored action information. Thus, there is no factual basis for the conclusion that "to determine the appropriate actions to take in response to the message" is possible with the combination of Cattan and Arneson.

The Office Action clearly acknowledges on page 6 that the system of Cattan lacks a mapping between a message identifier that uniquely identifies a message and stored action information as recited in claim 1 and thus seeks to rely on Arneson. This lack of disclose can be quickly confirmed by FIG. 4 of Cattan shown below where Cattan relies assignments between SMS destination addresses and URIs rather than mapping between a message identifier that uniquely identifies a message and stored action information as recited in claim 1.

SMS Destination Addresses	URIs
SMS Dest1	URI 1
SMS Dest2	URI 2
SMS Dest3	URI 3
***	***
SMS DestN	URI N

Yet, there is no teaching or suggestion in Arneson to use the claim check to obtain information as in FIG. 3 of Arneson other than mobile directory numbers, message summaries, or the original messages where as recited in claim 1 a unique message identifier is returned in a reply message and used to obtain stored action information. Thus, there is something missing as to why the artisan would have found using a unique message identifier returned in a reply message to obtain stored action information obvious from the alleged combination. The Office Action fails to provide any factual evidence or a convincing line of reasoning as to why the artisan would have found using a unique message identifier returned in a reply message to obtain stored action information to have been obvious in light of the teachings of Cattans desire to obtain action information based on a mapping between user IDs/SMS destination addresses and the action information and Arneson's complete lack of teaching or suggestion to use the claim

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check to obtain information other than mobile directory numbers, message summaries, or the original messages as recited in claim 1 where a unique message identifier returned in a reply message is used to obtain stored action information.

The lack of motivation to combine becomes stronger when recognizing the basis for Cattan's disclosure. In particular, Cattan explains in the Abstract that the invention is directed to converting a communication protocol utilized by a mobile telephone to an Internet-based communication protocol. Thus, the system in Cattan relies on specifics of the communication protocol to operate. The way in which stored action information is retrieved in Cattan is necessarily different than that recited in claim 1 due to the desire to facilitate conversion from a particular communication protocol. Specifically, Cattan has to rely on SMS destination addresses or a combination of user IDs/SMS destination addresses to map to stored action information due to perceived limitations of the "communication protocol utilized by a mobile telephone."

Claim 1 provides a substantially similar result of invoking an action as the system of Cattan and functions substantially similarly in the sense of messages being sent back and forth to invoke the action but the recited limitations do so in a substantially different way by relying on "storing message state information … providing a message identifier automatically generated by the computer system to uniquely identify the message to be sent to a device and a mapping between the message identifier automatically generated by the computer system and the stored action information." (Emphasis added). Therefore, the conclusion of a combination of Arneson with Cattan overlooks the problems being solved in Cattan and the way that the claim checks of Arneson would be integrated into the system of Cattan.

Cattan does not use state information that provides a message identifier automatically generated by a computer system and a mapping beteen the messages identifier and stored action information as recited in claim 1 because Cattan uses a different mapping structure (i.e., user IDs/SMS desination addresses to action information). Thus, Applicants submit that the proposed modification or combination with Arneson would change the principle of operation of the system of Cattan of being directed to "converting a communication protocol utilized by a mobile telephone to an Internet-based communication protocol." The fact that Cattan utilizes

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specifics of the desired communication protocol utilized by the mobile telephone to derive such mappings would favor a finding that the references are not sufficient to render the claims prima facie obvious as such a combination, as alleged, substantially changes the operation of the system in Cattan. In re Ratti, 270 F.2d 810, 123 USPQ 349 (CCPA 1959).

Furthermore, while Applicants recognize that the alleged combination does not necessarily render Cattan unsatisfactory for its intended purpose of protocol conversion, the mere fact that Cattan and Arneson can be combined or modified does not render the resultant combination obvious. KSR International Co. v. Teleflex Inc., 550 U.S. ___, ___, 82 USPQ2d 1385, 1396 (2007). Cattan and Arneson fail to provide sufficient teachings or suggestions that using the claim check of Arneson with the system of Cattan is a predicative variation rending claim 1 obvious. There are two considerations, firstly, that Cattan is devoid of using a mapping between a message identifier automatically generated by a computer system and stored action information as recited and relies instead on details of the SMS protocol and other gathered information. Thus, the skilled artisan would need some motivation that to no longer use the specifics of the SMS protocol to obtain action information in Cattan would be more beneficial. The Office Action provides no such evidences. Secondly, Arneson does not provide this because Arneson merely uses the claim check as shown in FIG. 3 to obtain the actual message rather than to obtain information other than the message, such as the action information as recited in claim 1. There is no further teaching or suggestion in Arneson to obtain any information further than the original message as there is no mapping between a message identifier and stored action information as recited in Arneson to provide a conclusion that such would be a predicable variation of the system of Cattan.

Based upon the above, Applicants respectfully submit that Cattan and Arneson fail to teach or suggest each and every one of the claim limitations recited in claim 1-25, such as:

storing message state information at the computer system that is unique to a message to be sent to a device, the message state information providing a message identifier automatically generated by the computer system to uniquely identify the message to be sent to a device and a mapping between the message identifier automatically generated by the computer system and the stored action information; and
retrieving action information corresponding to an action in the one or more actions using the computer system from the stored action information based on the at

least one of the one or more action identifiers for the actions represented in the message sent to the device and the mapping between the message identifier and the stored action information.

Further, even if Cattan and Anreson were combined as suggested in the Office Action (although there appears to be no motivation in the references for the combination and no reasonable expectation of success), the resultant combination would still not teach or suggest the above recited feature in claim 1-25.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

Further, the Commissioner is hereby authorized to charge any additional fees or credit any overpayment in connection with this paper to Deposit Account No. 20-1430.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 925-472-5000.

Respectfully submitted,

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